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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Applicant:	§	
Aniruddha P. Joshi et al.	§	Art Unit: 2622
	§	
Serial No.: 09/583,432	§	Examiner: Sherrie Y. Hsia
	§	
Filed: May 31, 2000	§	Atty Docket: ITL.0361US
	§	P8580
For: Power Management for	§	
Processor-Based Appliances	§	Assignee: Intel Corporation
	§	

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**REPLY BRIEF**

Sir:

In response to the new arguments set forth in the Examiner's Answer, the following Reply Brief is submitted.

Assuming that the operations set forth in the second full paragraph on page 4 of the Answer are accurate, they still demonstrate that the cited Brusky reference fails to anticipate. The following hypothetical example should bring this point home. Suppose a person uses a remote control and operates it. If both systems (PC and television) are completely functional, operation of the remote control, according to the Examiner, would turn on both the PC and the television. The Examiner contends that because this remote control operation operates the television, it also causes the PC to respond to operation of the television. But this is not so. Suppose the receiver, that receives the signal from the remote control on the television, is broken. When the user operates the remote control, the television comes on, but the PC does

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exactly the same thing it would have done if the television had not been broken. Thus, the PC does nothing "in response to operation of the television receiver." This is because the operation of the television receiver and the PC are totally independent over parallel paths. The operation of one has no effect on the other. They simply have a common source signal, but thereafter respond independently in all ways.

Therefore, the rejection based on Brusky should be reversed.

With respect to the rejection based on Miyagawa, the Examiner, for the first time on appeal, contends that it is well known to utilize a multiprocessor system to operate as a main CPU to control an internal bus. The assertion of something being well known at this late stage is inappropriate and is hereby challenged. The points raised in the appeal brief have been raised repeatedly during prosecution and the Examiner never resorted to anything being well known. The assertion that a video tape recorder must have multiple processors in a main CPU is certainly without any basis whatsoever. There is no reason why a video tape recorder needs a processor, a main processor, or any of the other asserted elements. It can simply operate magnetically using drives, as has been conventional for many years. Note that the Miyagawa patent was filed in 1989. No processors are anywhere shown and there is no reason to believe that in 1989 such a system would have been well known.

The suggestion that a bus line 28 makes it "certain that a VTR is a processor-based system" is baseless. To the contrary, the bus line interface circuit 28 is an analog circuit including a frequency separation type modem circuit 29 whose input and output terminal is connected to a branch coaxial cable. See column 4, line 52 through column 5, line 7.

Likewise, the assertion (without any support) that operation through the remote control of the television receiver causes signals to go via the bus lines 4 and 21 to enable the VTR to turn on is not supportable. Column 6, lines 8-10 specifically states that the video tape recorder is turned on by the remote commander 7. Thus, it receives a signal directly from the remote commander which turns it on and off just like the television receiver. Nothing suggests that the VTR transitions between states in response to operation of the television receiver. There is no reason to believe that the television is not already turned on at all times discussed in the reference, especially since column 6, lines 1-20 indicates that, when the video tape recorder turns on, it supplies the receiver with a command code indicating that a receiving channel should be changed to a vacant channel. For this to be the case, the television must already be on.

Moreover, there is nothing that suggests that the operation of the television receiver to change power consumption states transitions the video tape recorder.

With respect to the rejection based on Klosterman, the Examiner relies on column 8, lines 46-54 in Figure 4 and the contention that the Examiner's proposed operation is "clear." The Examiner simply ignores the point made in the Appellants' brief that the cited material goes to the trouble to indicate that the VCR is automatically turned on. But to record, there is no need for the television to be automatically turned on and we do not know if the television needed to be already on or not. The cited material simply does not say. Note that the VCR is connected in parallel to the cable box with the television. Thus, it could record a signal, whether or not the television is on or off.

Therefore, the rejection based on Klosterman should be reversed.

Respectfully submitted,

Date: December 4, 2006



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